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Attorneys for Defendant
BLUE CROSS AND BLUE SHIELD OF NORTH
CAROLINA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SETON MEDICAL CENTER, a California
non-profit religious corporation,

Plaintiff,

vs.

BLUE CROSS AND BLUE SHIELD OF
NORTH CAROLINA, a North Carolina
non-profit corporation; and DOES 1
THROUGH 25, INCLUSIVE,

Defendants.

Case No. 3:15-cv-06254 JCS

**STIPULATION TO EXTEND
DEFENDANT BLUE CROSS AND BLUE
SHIELD OF NORTH CAROLINA'S
TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Pursuant to Civil Local Rule 6-1(a), Defendant Blue Cross and Blue Shield of North Carolina ("BCBSNC"), by and through their respective counsel of record, hereby stipulate as follows:

Seton Medical Center ("Seton") served its state court Complaint on November 25, 2015;

BCBSNC removed this civil action, Case No. CIV536368, from the Superior Court of the State of California, for the County of San Mateo, to the United States District Court, for the Northern District of California, based upon diversity on December 29, 2015;

A responsive pleading to the Complaint is due to be filed and served on behalf of BCBSNC on or before January 5, 2016;

BCBSNC has requested and Plaintiff has granted an extension of time of an additional 27 days to and including February 1, 2016 for BCBSNC to answer, move or otherwise respond to the Complaint;

An additional 27 days for BCBSNC answer or respond to Plaintiff's Complaint will not alter the date of any event or any deadline already fixed by Court order since there have been no Court orders to date;

IT IS HEREBY STIPULATED by and between Plaintiff and BCBSNC, by and through their respective attorneys of record, that BCBSNC shall answer, move or otherwise respond to Plaintiff's Complaint on or before February 1, 2016.

Dated: December 29, 2015

STEPHENSON, ACQUISTO & COLMAN
Melanie Joy Stephenson
Barry Sullivan
Richard A. Lovich
Karlene J. Rogers Aberman
Christine V. Nitoff

By: /s/ Christine V. Nitoff

Christine V. Nitoff
Attorneys for Plaintiff
SETON MEDICAL CENTER

Dated: December 29, 2015

VON BEHREN & HUNTER LLP
William E. von Behren
Joann Lee

DATED: 1/7/16

/s/ Joann Lee

Joann Lee
Attorneys for Defendant
BLUE CROSS AND BLUE SHIELD
OF NORTH CAROLINA

